

Rogal & Donnellan, P.C.

Attorneys at Law

Suite 203  
100 River Ridge Drive  
Norwood, Massachusetts 02062  
tel. 781.255.1200  
fax. 781.255.7750

February 25, 2020

Kevin S. Clapp  
79 Brookville Avenue  
Brockton, Massachusetts 02302

Re: Clapp v. Baker et al., U.S.D.C. C.A.# 18-cv-10426-ABS

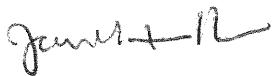
Dear Mr. Clapp:

Since my correspondence to you dated February 24, 2020 was sent I have been informed that you claim to have not received the discovery requests that I served upon you on January 15, 2020. Per your request, I am serving this second set to you via Fed Ex delivery. I will agree upon Friday, April 4, 2020 as the date you are required to respond to the enclosed requests if you immediately return the enclosed releases so that I may obtain your treatment records.

As you are aware, Fed. R. Civ. P. 26(a)(1)(A)(iii) mandates that you provide the documents that I am requesting. Please fill in the name of each of your care providers that has provided care to you that you allege was necessary because of the conduct of any of the Defendants. This request covers both health care and mental health care providers. I have enclosed ten releases and a return envelope for your use.

I would appreciate it if you would return the releases no later than March 4, 2020 so that I have the records in advance of your deposition that is scheduled for Wednesday, April 15, 2020. Thank you for your anticipated cooperation regarding the enclosed.

Very truly yours,

  
Joseph G. Donnellan

Enc.

c.c.: Counsel of Record